

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ISRAEL BOLLAG, Individually And On Behalf of) Civil Action No.: 1:07-cv-03994-LTS
All Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH, SHELLY SINGHAL, J.P. MORGAN)
SECURITIES INC., UBS AG, CIBC WORLD)
MARKETS CORP., and WR HAMBRECHT &)
CO., LLC,)
Defendants.)
LEO YEN, Individually And On Behalf of All) Civil Action No.: 1:07-cv-04046-LTS
Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH, SHELLY SINGHAL, ZHU SHAN,)
GRAHAM EARNSHAW, ALOYSIUS T. LAWN,)
JOHN H. SPRINGER, ZHOA LI, LONG QIU)
YUN, MORGAN SECURITIES, INC., UBS AG,)
CIBC WORLD MARKETS CORP., and WR)
HAMBRECHT &)
CO., LLC,)
Defendants.)

)
ALTON PARTNERS, Individually And On Behalf of)
All Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH and SHELLY SINGHAL,)
Defendants.)

)
BRICKMAN INVESTMENTS INC., Individually And)
On Behalf of All Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH, SHELLY SINGHAL, J.P. MORGAN)
SECURITIES INC., UBS AG, CIBC WORLD)
MARKETS CORP., and WR HAMBRECHT &)
CO., LLC,)
Defendants.)

)
Civil Action No.: 1:07-cv-04443-LTS
)
Civil Action No.: 1:07-cv-04719-LTS
)

)
BLOOMFIELD INC., Individually And On Behalf of)
All Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH, SHELLY SINGHAL, J.P. MORGAN)
SECURITIES INC., UBS AG, CIBC WORLD)
MARKETS CORP., and WR HAMBRECHT &)
CO., LLC,)
Defendants.)
)
JIAJU CHU, Individually And On Behalf of All)
Others Similarly Situated,)
Plaintiff,)
vs.)
XINHUA FINANCE MEDIA LTD., FREDY)
BUSH, SHELLY SINGHAL, J.P. MORGAN)
SECURITIES INC., UBS AG, CIBC WORLD)
MARKETS CORP., and WR HAMBRECHT &)
CO., LLC,)
Defendants.)
)
)

) Civil Action No.: 1:07-cv-04727-LTS
)

) Civil Action No.: 1:07-cv-06145-LTS
)

**NOTICE OF MOTION OF DELTA PARTNERS, LLC FOR
CONSOLIDATION OF THE RELATED CASES, APPOINTMENT AS
LEAD PLAINTIFF, AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that Class member Delta Partners, LLC (the “Movant”)

hereby moves this Court pursuant to Fed. R. Civ. P. 42(c) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 (2007) and the Securities Act of 1933, 15 U.S.C.A. § 77z-1 (2007) at the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order: (a) consolidating all related cases; (b) appointing Movant to serve as lead plaintiff; and (c) approving Movant's selection of counsel for the Class.

In support of its motion, Movant submits: (a) the Declaration of Maria J. Ciccia, Esq., dated July 23, 2007, and annexed exhibits; (b) a Memorandum of Law dated July 23, 2007; and (c) a Proposed Order granting Movant's motion for consolidation of the related cases, appointment as lead plaintiff and approval of its selection of lead counsel for the Class.

Dated: July 23, 2007

Respectfully submitted,

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